



June 28, 2019

Lisa M. Fowlkes
Bureau Chief
Public Safety and Homeland Security Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: PS Docket No. 15-91

Dear Ms. Fowlkes:

I am writing on behalf of U.S. Cellular in response to your June 5, 2019 letter regarding the status of our deployment of WEA 3.0. In your letter you asked for our commitment that we will comply with the currently set deadline of November 30, 2019 for WEA 3.0. U.S. Cellular is committed to implementing WEA 3.0 in as timely a fashion as is possible. At this point though, it is simply not possible to commit to wide scale deployment within our network by the current November 30, 2019 deadline. This is not to say that we will be unable to meet the deadline; it is only to say that substantial uncertainties exist that make such a commitment not possible at this time.

As we have discussed with Bureau staff on numerous occasions, there are a number of gating factors to a timely and successful deployment of WEA 3.0. Many of those factors are beyond the control of U.S. Cellular and, therefore, successful deployment by November 30 remains of concern to us. We elaborate on the uncertainties we face in the following paragraphs.

WEA 3.0 Standards were completed on May 2, 2019 when the Alliance for Telecommunication Industry Solutions ("ATIS") approved the four high priority WEA 3.0 specifications for publication (Device Based Geo-Fencing, Mobile Device Behavior, new interface between Alert Gateway and BMC, and Evolved Packet System). Subsequent to standards publication, our primary network vendors Ericsson and Nokia have begun to provide us with guidance regarding the activities that will be required to successfully

implement the new standards in our network. Such activities will include development, testing, and deployment of software upgrades for all of our RAN core platforms and associated performance management tools. Negotiations with our network vendors are ongoing. We do not have committed delivery dates from our network vendors yet although they have stated that they are highly committed to applying all possible resources to completing the development work as expeditiously as is feasible.

Once the software upgrade is made available to us, there needs to be sufficient time to fully test it in a network environment. We have significant concerns regarding the time necessary for the testing phase for WEA 3.0 and associated risks. Any time U.S. Cellular deploys new network software of this scope and scale, we normally engage in pre-deployment network testing lasting many months in an effort to avoid service jeopardizing outages (which, of course, could undermine all WEA capabilities as well as more basic services including voice calling). We are currently working with our vendors on test plans to accelerate timelines, but we continue to evaluate the risk/reward of doing so.

Beyond the network deployment, U.S. Cellular is also reliant on its device manufacturers (and, therefore, also on chipset vendors) to successfully develop, test and deliver WEA 3.0 devices. We continue to work with Apple, Samsung, Google and others on that aspect of the deployment. To date, Original Equipment Manufacturers (“OEMs”) have been engaged in planning of compliant test devices but have been unable to provide a firm timeline for delivery of compliant commercial devices or upgrades to existing commercial devices to make those devices WEA 3.0 compliant.

Once the network upgrades are completed and OEMs begin to deliver devices capable of WEA 3.0, U.S. Cellular will need to test the network and devices in a production environment. However, timely testing is also contingent upon Federal Emergency Management Agency (“FEMA”) IPAWs and Alert Origination Software being upgraded to support WEA 3.0. Absent timely FEMA upgrades, necessary testing cannot be completed which could further jeopardize deployment by the current November 30, 2019 deadline.

While we work to implement WEA 3.0, we will continue to support wireless emergency alerts for our customers as we always have. Once FEMA completes its testing of WEA 2.0 (which is already two months late), we are fully prepared to promptly implement WEA 2.0 on an “in part” basis.

Please contact me if you have any questions regarding our response to your inquiry. We would be glad to discuss our efforts in greater detail.

Sincerely,

Grant B Spellmeyer
Vice President – Federal Affairs & Public Policy

CC: Linda.Pintro@fcc.gov